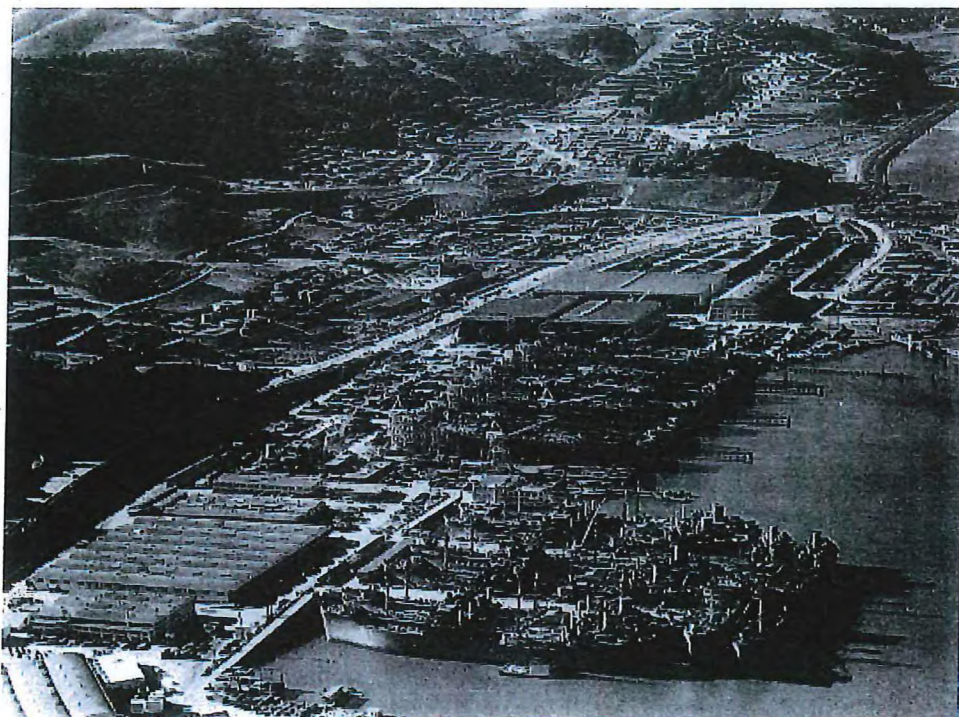


FINDING OF EFFECT

Marinship Machine Shop Stabilization and Rehabilitation Project

25 Liberty Ship Way
Sausalito, California



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Introduction

Previous Section 106 Compliance Activities

In April 2011, the VA initiated consultation for the construction of a research building at 25 Liberty Ship Way, Sausalito, CA (also known as the San Francisco Veterans Affairs Medical Center Annex). In the response letter dated May 17, 2011, the California Office of Historic Preservation (OHP) was unable to concur on the determination of the Area of Potential Effects (APE), because an undertaking was not established and defined. Further, the letter noted that options other than demolition were available for the existing building (commonly known as the Machine Shop), and the OHP recommended that a third party experienced in using the California Historic Building Code undertake a review of potential development options for the building. The OHP also could not concur with the eligibility determinations due to the omission of other potential contexts under which the building and property might also be determined eligible for the inclusion in the National Register of Historic Places (NRHP). The OHP referenced other potential historic resources in the vicinity which may also require evaluations and addressed the archaeological sensitivity of the site. Finally, it was requested in the letter that the Machine Shop's character defining features be identified.

In March 2014, the VA reinitiated the consultation for the proposed Research Building at 25 Liberty Ship Way and expressed the goal of redirecting the project from demolition and new construction to stabilization and rehabilitation. In the March 24, 2014 letter, the VA responded to the issues previously raised by the OHP. The VA stated that the proposed action is a federal undertaking and that it has the potential to cause effects on historic properties, and that a scope of work was being developed to study possible rehabilitation plans for the building. Also, the letter addressed the VA's goal of locating modular temporary facilities on site. The VA concurred with the OHP position that the Machine Shop is eligible for the NRHP, and sought further discussion on the historic eligibility of nearby piers and buildings. Due to the archeological sensitivity of the site the VA stated it would be developing plans for archeological testing and monitoring. Also, it was indicated that the design contractor would be tasked with identifying character defining features in greater detail. In summary, the letter conveyed the intention of reorienting the project toward rehabilitation in compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOISTHP).

OHP responded to the VA on April 15, 2014 with several comments and noted that "importantly, the subject building has been determined individually eligible for National Register of Historic Places inclusion ... and [it] has been further determined that the machine shop is most likely a contributing element to an as yet unevaluated historic district." The OHP remarked: that they were encouraged that stabilization and rehabilitation options were being explored; that consideration of the possible historic district should be taken for the installation of any temporary facilities; that any archeological testing and monitoring program would need to be reviewed and commented on before finalization; and that the VA was initiating consultation with the OHP and the Advisory Council on Historic Preservation (ACHP) to ensure SOISTHP compliance and would be seeking and considering comments from all interested parties.

The VA sent an update letter to the OHP on August 29, 2014 to provide additional information on the undertaking. The letter indicated that an A/E design firm had been selected for the stabilization and rehabilitation project, and that the project would include the design for 8,000 square feet of temporary modular space located to minimize the impact to the potential historic district. The VA again iterated an understanding of the importance of both community and OHP involvement as part of this undertaking.

The VA then sent a letter requesting to continue consultation on the Machine Shop Stabilization and Rehabilitation Project on May 07, 2015. The letter detailed the general design approach to the undertaking, outlined the plan for public involvement, identified character defining features for the Machine Shop, provided maps illustrating the architectural and archaeological APEs and stated the intention to develop a finding of effect. The OHP responded on June 08, 2015 with several comments and recommendations. The comments were addressed in an additional submission by the VA to the OHP dated December 01, 2015, which also included a Draft Finding of Effect, a Draft Public Outreach letter, and selected 65% CD drawings. The OHP received the December 2015 submittal and in agreement with the VA postponed making additional comments until after the receipt of the final Finding of Effect and completed drawings.

Summary Finding of Effect

After conducting an effects assessment, a finding of No Adverse Effect pursuant to 36 CFR Part 800.5(b) appears appropriate for the proposed Marinship Machine Shop Stabilization and Rehabilitation Project as designed and contingent on the development of a suitable archeological testing and monitoring program approved by the OHP, because the undertaking would not impair the characteristics that qualify either the potential Marinship Historic District or the Machine Shop for inclusion in the NRHP and there are no known prehistoric or historic-era archaeological resources that would be impacted by the project. The proposed work to the Machine Shop has been found to comply with the SOISTHP, while protecting the building from further deterioration. Also, no adverse effect was determined due to the insertion of the three temporary modular units, as the units would not impact the historical integrity of the Machine Shop or the potential historic district or alter any existing relationship between the extant Marinship buildings located within the APE.

Description of Proposed Undertaking

The extent of the project site includes the former Marinship Machine Shop, an approximately 25,000 square foot building constructed in 1942, and the adjacent parking lot. The proposed project includes the exterior rehabilitation and stabilization of the Machine Shop to be completed in compliance with the SOISTHP and the installation of three temporary modular units at the parking lot. The anticipated maximum depth of ground disturbance for the project is expected to be four feet at the post locations for the new perimeter fence, while at the interior of the site the anticipated depth of excavation is typically around twelve inches. As part of project development both the VA project team and the project architect have reviewed *Preservation Brief 31: Mothballing Historic Buildings* (Park 1993).

The ultimate use for the Machine Shop has yet to be determined and the building would remain unoccupied immediately following the completion of the proposed work. The project would serve to ensure that the building is made water-tight and secure. The temporary modular units, which are anticipated to be onsite for two to three years, would house a facility for computer based research and administrative functions.

The proposed undertaking would rehabilitate and structurally stabilize the exterior shell of the Machine Shop, including but not limited to the roof, exterior walls, doors and windows. The scope of work includes: replacement of the exterior cladding and roofing material, rehabilitation or replacement in kind of exterior window and door trim, rehabilitation or replacement in kind of original wood windows and doors and abatement of exterior hazardous materials. The existing deteriorated plywood would be replaced with painted fiber cement board of the same dimension to provide a similar aesthetic to the plywood. The proposed roofing material includes single ply at the low-slope roof and TPO over plywood at the barrel-vaulted roof. Limited structural work may be required to ensure the integrity of the building envelope. Structural work would be limited to framing infill as needed to support the new siding installation; no structural work will be done to the main gravity system within in the structure, nor to the foundation as part of the proposed undertaking. No work is planned to the building interior or to any of the mechanical, electrical or plumbing systems.

A primary goal of the project is to ensure that the Machine Shop is both water-tight and secure. The inclusion of window and door repair as part of the proposed work will help to meet that goal. Also, it is anticipated that in the next few years funding will become available to undertake the rehabilitation of the building's interior, and it would be preferable that the exterior work already be complete.

The proposed undertaking would also locate three new one-story modular office buildings, with a total of 7,325 gross square feet, on the existing paved surface lot at the east side of the Machine Shop. The work for the modular buildings would include: new foundations, relocation and/or abandonment of existing site utilities, new site work and new parking striping. The modular buildings are proposed to be sited at the eastern edge of the property approximately twenty-eight feet away from the Machine Shop. The buildings would be twelve-feet-six-inches tall at the highest point, and would feature vertical board siding painted a neutral color, either a tan or light brown, and a metal roof. It is anticipated that the modular units will be onsite for two to three years, and, if possible, they will be removed sooner.

Several trees would be removed, and portions of the existing sidewalk and chain link fence would be demolished. New fencing would be installed at the property boundaries with new security gates at the northwest corner and on the south side between the Machine Shop and the modular buildings and three new pedestrian gates at the western side adjacent the modular buildings.

Consultation and Public Participation

In accordance with our responsibilities under Section 106, the VA has identified a process for soliciting public comments on environmental review documents. This process includes coordination with agencies and organizations with a demonstrated interest in heritage resources or in the VA's Sausalito Annex

project. It also includes providing members of the public with similar interests an opportunity to comment on the identification of historic properties and finding of effect, and taking those comments into consideration during consultation with the OHP under Section 106.

The VA has identified organizations that have a demonstrated interest in the treatment of historic properties in Sausalito and the Marinship Site. The following agencies and organizations have been notified of the undertaking with a letter sent in March 11, 2016:

- City of Sausalito (Certified Local Government)
- County of Marin
- Sausalito Historical Society
- National Park Service, Pacific West Region
- California Preservation Foundation
- National Trust for Historic Preservation, San Francisco Field Office
- US Army Corps of Engineers, San Francisco District

To date no responses to the public outreach letter have been received.

Further, representatives of the VA presented the undertaking for public comment at the following meetings in 2016:

- April 12, 2016, City of Sausalito Historic Landmarks Board
- April 19, 2016, City of Sausalito City Council
- October 5, 2016, City of Sausalito Planning Commission

Some of the primary discussion topics raised by the public included concerns regarding: the project timeline, the protection of the historic building, and the proposed future use of the Machine Shop. Additional public involvement for the proposed undertaking will include posting the project specific Section 106 Finding of Effect document on the San Francisco Veterans Affairs Medical Center website

The Native American Heritage Commission (NAHC) has provided a list of tribal representatives who may have an interest in this location. The tribal group currently identified by the NAHC for Marin County is the Federate Indians of Graton Rancheria (FIGR). The Tribal Historic Preservation Officer for the FIGR has been notified of the proposed undertaking and has requested continued consultation with the VA.

Description of Historic Properties

The NWIC records search results indicate that between 1980 and 2014, fourteen cultural resources studies were conducted within a ½ mile radius of the project site. These studies resulted in the recordation of three historic resources, including the Napa Street Pier, the Locus Street Pump Station, and Arques Shipyard and Marina; and two prehistoric archaeological resources both located about ½ mile from the project site (NWIC 2015).

Archaeological Resources

The subject site is comprised entirely of artificial fill over tidal marshlands, on top of which the Machine Shop was constructed. No known eligible archaeological sites are located within or adjacent to the site. The site was created by fill from other areas of Sausalito in the early 1940s as part of the local wartime expansion. It is doubtful that the fill material was screened for potential archaeological resources during the initial construction period, and it is extremely unlikely that any intact prehistoric-period archaeological resources within the archeological APE are present. However, there is likelihood for the presence of historic-era archaeological resources associated with the NWP railroad and the later use of the site by the Corps. Therefore, it is possible that unanticipated archaeological finds could occur during excavation and other activities disturbing the subsurface. The OHP concurred with the VA that the proposed project site appears to be archaeologically sensitive (OHP 2011).

Historical Resources

The Machine Shop was listed in the City of Sausalito's Local Historic Register in September 2012, but is not currently listed in the California Register of Historical Resources (CRHR) or the National Register of Historic Places (NRHP). Previous studies completed by Advance Design Consultants (2009) and Knapp & VerPlanck Preservation Architects (April 2011) indicate that the Machine Shop appears eligible for the NRHP for its association and affiliation with several historic contexts during a period of significance between May 1942 and September 1946. Also, the building may be eligible as a contributing resource to a potential Marinship Historic District. A NRHP nomination has been prepared by VerPlanck for the Machine Shop and a Historic Context Statement and evaluation was prepared for the Marinship Historic District, but neither resource has officially been listed on either the California or National Registers. The OHP concurred on the findings that the Machine Shop is eligible for listing in NRHP in December 2013.

Marinship Historic District

The Marinship Historic Context Statement (Knapp & VerPlanck, 2011) found that only one section of the former Marinship site retained "any sort of historical continuity – the former outfitting zone at the southern portion of the yard." The zone includes eight surviving Marinship buildings (Buildings 10, 11, 12, 13, 15, 17, 26, and 29) in their original locations (see Figure 1). Most of the buildings were found to have been altered and their setting changed, but still retained their characteristic barrel-vaulted roofs, historic scale and massing. Knapp & VerPlanck found that the potential district did not retain sufficient integrity for listing in the NRHP, but potentially could be found eligible for the California Register. It is understood that a final determination of historical integrity has not been made by the OHP, therefore for

the purposes of the Section 106 project analysis only, the potential historic district will be considered eligible for the NRHP in order to fully assess potential effects.

Machine Shop

The Machine Shop has been determined eligible for listing in the NRHP under Criterion A for its association with the rapid expansion of Homefront industries during World War II and under Criterion C for embodying World War II era wartime construction and being the best surviving example of a World War II era emergency shipyard building at Marinship and in the greater Bay Area. The period of significance under Criterion A is 1942-1946, from the building's construction to Marinship's closure. The Criterion C period of significance is 1942, the year of construction. A NRHP nomination has been prepared and the OHP concurred with the findings that the building is individually eligible for the NRHP at the local level of significance.

Identification of Character Defining Features

The following elements have been identified as character defining features of the Machine Shop building:

Exterior

- Barrel-vaulted roof
- Wood ribbon windows
- Wood double-hung windows
- Plywood exterior cladding
- Metal-clad barn doors
- Painted 'Machine Shop' signs
- Wood panel pedestrian doors at the southeast façade
- Wood trim

Interior

- Glulam bowstring trusses
- Heavy-timber frame
- Concrete floor
- Wood plank interior walls
- Overhead traveling cranes



Figure 1: Aerial illustrating the general extent of the former outfitting zone and the extant buildings that together may constitute a potential historic district. Architectural APE outlined in blue.



Figure 2: Exterior view of the Machine Shop looking at the building's southeast corner.



Figure 3: Interior view of the Machine Shop's northern bay looking east.

Application of the Criteria of Adverse Effect

Criteria for Assessing Project Effects

Regulatory Framework

National Historic Preservation Act of 1966

The National Historic Preservation Act (NHPA) established the Advisory Council on Historic Preservation (ACHP), authorized the Secretary of the Interior to maintain the NRHP, directed the Secretary of the Interior to approve state historic preservation programs that provide for a state historic preservation offices, established the National Historic Preservation Fund program, and codified the National Historic Landmark program.

Section 106 of the NHPA requires that federal agencies take into account the effects of their actions (referred to as “undertakings” under Section 106) on properties that may be eligible for or listed in the NRHP, and afford the ACHP a reasonable opportunity to comment.

Section 106 of the National Historic Preservation Act of 1966

Section 106 of the NHPA and its implementing regulations, 36 CFR 800, as amended in 1999, requires federal agencies to consider the effects of their undertaking, or those they fund or permit, on properties that may be eligible for listing, or are listed in the NRHP.

The regulations implementing Section 106 call for considerable consultation with the OHP, Native American tribes, and interested members of the public throughout the process. The four principle steps are as follows:

1. Initiate the Section 106 process, including a plan for public involvement (36 CFR 800.3)
2. Identify historic properties, consisting of those resources within an APE that are eligible for inclusion in the NRHP (36 CFR 800.4)
3. Assess the effects of the undertaking to the historic properties in the APE (36 CFR 800.5)
4. Resolve adverse effects (36 CFR 800.6)

The Marinship Machine Shop Stabilization and Rehabilitation project is an undertaking that is subject to Section 106 of the NHPA because implementation of this proposed undertaking would constitute a federal action with the potential to affect NRHP-eligible properties. The VA is the lead federal agency responsible for compliance with Section 106 for this undertaking.

Per the requirements of the NHPA, the VA has initiated consultation under Section 106 with OHP to solicit comments on the proposed undertaking.

Effects Assessment

Assessment Methods

The framework for assessing adverse effects on historic properties due to an undertaking is provided in Section 106. According to 36 CFR 800.5, an undertaking would have an adverse effect on historic properties if the project impairs the characteristics that qualify a property for inclusion in the NRHP. In order for a property to convey its historical significance it must retain its historical integrity, which is a historic property's ability to convey its significance to a viewer by virtue of retaining those aspects of location, design, materials, workmanship, feeling, setting, and association that are necessary in understanding the property's historically significant role. Integrity may be assessed in terms of an individually eligible building, as well as a historic district as a whole.

The following examples are actions that typically result in a finding of adverse effect on a historic property:

- Physical destruction of or damage to all or part of the property.
- Alteration of the property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the SOISTHP and applicable guidelines.
- Removal of the property from its historic location.
- Changing the character of the property's use or of physical features within the property's setting that contribute to its historic significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.
- Neglect of the property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization.
- Transfer, lease or sale of the property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

Archaeology

The proposed undertaking would include areas of ground disturbance of up to twelve inches in depth within the immediate project site and select areas of up to four feet in depth at the post locations for the new perimeter fence. Previous archaeological research indicates that no prehistoric or historic-era

archaeological sites, features, artifacts, or human remains have been documented within the project APE. Therefore, no known archaeological historic properties would be affected. Because the proposed project site consists of fill from other areas, it appears to be archaeologically sensitive, and although no known resources have been documented, it is possible that unanticipated archaeological finds could occur during excavation and other activities disturbing the subsurface within the APE. The VA will require that the construction contractor provide an onsite archeologist during site excavation activities to monitor the work and document any inadvertent discoveries of archaeological resources during construction. Mitigative action has been drafted in the project's Environmental Assessment (GHD 2015) outlining steps to be taken if discoveries are made. There would be no adverse effect on any known archaeological site, however due to potential unknowns the VA will require an archeologist to be on site during excavation for monitoring and documentation, if needed.

Marinship Historic District

The proposed undertaking would introduce new visual elements (three new modular units) within the boundaries of a potential historic district. (At this time the author has not seen the proposed boundaries for the potential historic district, but it is assumed that the parking lot east of the Machine Shop would be included.) The new modular units would not diminish the existing buildings' historical relationships to each other, because the new units would not be located between any of the existing Marinship buildings. They would, however, add a new element between the Machine Shop and Richardson Bay. During the period of significance, there was a direct and mostly open path from the Machine Shop to the Outfitting Docks. Historic photos also indicate that much of the site just east of the building was used for parking and storage, much as it is today. Circa 1949 the U.S. Army Corps constructed a Butler building to the east of Building 11 at the waterfront. The Butler building changed the direct relationship of Building 11 to the Outfitting Docks and Richardson Bay. Additionally, several small buildings housing boat repair, rigging, painting and other maritime businesses have been constructed at the edge of the water, east of the Machine Shop, to support the current use of former Outfitting Dock area as a marina.

Given the numerous intrusions already constructed within the area, including the Butler building and several other small buildings, and the temporary nature of the modular units, the insertion of the modular units would not cause an adverse effect on the potential historic district, because they would not further diminish the integrity of the property's significant historic features. The characteristic barrel-vaulted roofs, as well as the remaining buildings' historic scale and massing, and relationship to each other would remain unaltered.

The modular units would be twenty-eight feet away from the Machine Shop, thereby allowing sufficient room to view the east façade and the relationship between the Machine Shop and the neighboring structures (Buildings 10, 17, and 29.) Also, the units would be significantly lower in height than the Machine Shop; therefore the building and its neighbors would be visible over the modular units. The connection between the Machine Shop and the water is already visually impaired by the Butler building, which was constructed postwar and does not contribute to the significance of the potential Marinship Historic District, as well as other small buildings. Further, research does not indicate that the parking lot

adjacent to the Machine Shop maintains any historical significance in relation to the potential historic district.

Machine Shop

For the same reasons stated above, the construction of new modular units would not cause an adverse effect on the Machine Shop as an individual historic resource. The building's historical integrity and ability to convey its historical significance would not be impeded by the insertion of temporary modular units on the adjacent parking lot.

The rehabilitation work proposed for the Machine Shop must be consistent with the SOISTHP in order for the undertaking to not cause an adverse effect on the Machine Shop, a historic resource. Below is an assessment of the proposed building rehabilitation's compliance to the SOISTHP.

SOISTHP Application

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

Comment: The original use of the property was as a shipyard machine shop that supported the construction of Liberty Ships, T-2 tankers and oilers for World War II. The shipyard was decommissioned to the U.S. Army Corps of Engineers in 1946. The Machine Shop was subsequently converted into a materials testing laboratory and was operated as such until 1996. The building has been unoccupied since the materials testing laboratory ceased operations. There is no proposed use at this time and the building is to remain unoccupied, which would not require any changes to the defining characteristics of the Machine Shop.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

Comment: The building's overall form and barrel-vaulted roofline will be preserved. Other significant features, such as the windows, doors and wood trim elements will be repaired or replaced in kind. The exterior plywood cladding has been identified as a character defining feature of the building. The material is in extremely poor condition and can no longer be salvaged. The proposed project would replace the plywood (a material that was intended to be temporary and does not weather well within the site's marine environment) with fiber cement board as the exterior cladding material. The fiber cement board would be produced to match the original dimensions of the existing plywood and painted to provide an appearance similar to the historic aesthetic. The new material would retain the essential character defining aspects of the building's original plywood, while providing for greater longevity of the building.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

Comment: The proposed project would not create a false sense of historical development and would not include any architectural elements from other buildings. All proposed work to the building's exterior has been developed from the original construction drawings and field investigations; therefore there are no conjectural elements proposed for the project.

4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.

Comment: It does not appear that any changes to the Machine Shop, its site, or adjacent contributing structures have acquired any historic significance. Non-original exterior elements that have not acquired historic significance, such as the rear exterior stair, selected pipes and light fixtures, are planned to be removed.

5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.

Comment: No distinctive features, finishes, and construction techniques that characterize the property would be diminished or destroyed. Distinctive elements such as the window and door assemblies and eave detailing would be repaired or replace in kind.

6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

Comment: The exterior historic features of the building, such as doors, windows, skylights, eaves, gutters, and trim, would be either repaired or replaced in kind. The existing plywood cladding is too deteriorated to be repaired and must be replaced. Because plywood has proven not to fare well in the site's marine climate, an alternative material, fiber cement board, would be installed in place of the plywood. The fiber cement board would match as closely as possible the design, color and visual quality of the historic plywood. It would match the plywood dimensions and be painted to provide a similar aesthetic. Additionally, the plans call for the existing "Machine Shop" sign to be documented and repainted onto the fiber cement board to the original specifications. The new roof would consist of single ply at the low-slope section and TPO over plywood at the barrel vaults. The TPO would provide a similar smooth appearance as the original rolled composition roofing. The exterior rehabilitation design work has been developed from both on site investigations of the existing structure by the project architect and preservation consultant and studies of the original construction drawings and historic photos.

7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.

Comment: There no plans for any chemical or physical treatments to be undertaken on any historic materials as part of this project.

8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.

Comment: The VA will require that an archeologist be present during project excavation to monitor the work and document any inadvertent archeological discoveries. The amount of ground disturbance is anticipated to be minimal. The greatest depth would be four feet at the post locations for the new perimeter fence, while at the interior of the site the anticipated depth of excavation is typically around twelve inches. At this time, there are no known archaeological resources within the project site.

Additionally, the Draft Environmental Assessment prepared for the VA Sausalito Annex project (GHD 2015) details a mitigative action outlining the process to be followed in the event of an inadvertent discovery of previously undocumented archaeological resources or human remains.

9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.

Comment: The subject undertaking includes the rehabilitation and stabilization of the Machine Shop's exterior. The work to be done at the building's exterior would protect the building's character defining features, and any historic materials that characterize the property would be replaced in kind or with a compatible material. No new additions are proposed.

Three new modular units are planned to be sited at the east parking lot adjacent to the Machine Shop. The modular units would be clearly modern, significantly smaller in height (12 feet 6 inches tall) and overall size, and sited as far from the historic building as possible on the given site. The temporary structures would not impact the historic integrity of the Machine Shop, in particular because they would be located on the parking lot site that has been historically used for both parking and storage. The historic building would remain visible at the east side and its relationship to the neighboring Marinship buildings would remain unchanged. The proposed neutral color palette for the modular units would be compatible to the existing neutral colors of the extant historic buildings.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Comment: When the proposed modular units are removed from the project site, the essential form and integrity of the historic property and its environment would remain unimpaired. The historic Machine Shop would not be impacted by the eventual removal of the modular units.

Conclusions

The proposed undertaking has the potential to impact existing historic resources located within the established APE that are eligible for the NRHP. The identified historic resources include the Marinship Machine Shop (Building 11) and Buildings 10, 17 and 29 which are also contributors to the potential Marinship Historic District. The proposed Marinship Machine Shop Stabilization and Rehabilitation Project would not have an adverse effect on either the potential Marinship Historic District or the Machine Shop. The project design complies with the SOISTHP and would serve to protect the historic Machine Shop building from further deterioration. The insertion of the three modular units would not impact the historical integrity of the Machine Shop or the potential historic district or any existing relationship between the extant Marinship buildings within the APE. Therefore, a finding of No Adverse Effect pursuant to 36 CFR Part 800.5(b) would be appropriate for the proposed undertaking as designed and with the requirement that the construction contractor have an archeologist on site during any site excavation activities, because the project would not impair the characteristics that qualify the properties for potential inclusion in the NRHP and there are no known prehistoric or historic-era archaeological resources that would be impacted by the project.

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